UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

Case No. //cr /0268

v.

VIOLATIONS:

ELLIOT DOXER,

18 U.S.C. § 1831 (Foreign Economic Espionage)

Defendant

INFORMATION

COUNT ONE: 18 US.C. § 1831 - Foreign Economic Espionage

The United States Attorney charges that:

From October 2007 through June 2009, in the District of Massachusetts and elsewhere, the defendant,

ELLIOT DOXER,

intending and knowing that the offense would benefit a foreign government, namely, the Government of Israel, and its instrumentalities and agents, knowingly stole trade secrets, to wit, confidential customer identity and contract information, and obtained them by fraud, artifice, and deception; appropriated, took, carried away, concealed, copied, duplicated, replicated, transmitted, delivered, sent, communicated, and conveyed them without authorization; and possessed them while knowing them to have been stolen, appropriated, obtained, and converted without authorization; and attempted to do so.

All in violation of Title 18, United States Code, Section 1831.

Respectfully submitted,

Carmen M. Ortiz United States Attorney

By:

William D. Weinreb

Scott Garland

Assistant U.S. Attorney